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May 22, 2020

**VIA ELECTRONIC FILING**

Ms. Jocelyn Boyd  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

Re: Piedmont Natural Gas Company, Inc.  
Docket No. 2020-\_\_\_\_-G

Dear Ms. Boyd:

Enclosed please find the Petition of Piedmont Natural Gas Company, Inc. for Approval to Suspend Routine Meter Testing for the Remainder of 2020 in the above-captioned docket.

Thank you for your assistance with this matter. If you have any questions regarding this filing, you may reach me at the number shown above.

Sincerely,

/s/ T. Richmond McPherson III  
T. Richmond McPherson III

TRM/sko

Enclosure

cc: ORS  
Carri Grube Lybarker  
Bruce Barkley  
Pia Powers

**BEFORE THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

**DOCKET NO. 2020-\_\_-G**

In the Matter of:

Petition of Piedmont Natural  
Gas Company, Inc. for Approval  
to Suspend Routine Meter  
Testing for the Remainder of 2020

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**PETITION  
TO SUSPEND ROUTINE METER  
TESTING FOR THE REMAINDER  
OF 2020**

Piedmont Natural Gas Company, Inc. (“Piedmont” or the “Company”), through counsel and pursuant to Rules 103-825 and 103-475 of the Rules and Regulations of the Public Service Commission of South Carolina (“Commission”), hereby requests approval by the Commission to be relieved of its obligation for the remainder of 2020 to conduct its routine meter testing for residential and commercial meters. In support of this Petition, Piedmont respectfully shows unto the Commission as follows:

1. It is respectfully requested that any notices or other communications with regard to this Petition be sent to:

T. Richmond McPherson III  
McGuireWoods LLP  
201 North Tryon Street, Suite 3000  
Charlotte, North Carolina 28202  
Telephone: (704) 343-2038  
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and

Brian S. Heslin  
Deputy General Counsel  
Duke Energy Corporation  
550 S. Tryon Street  
Charlotte, NC 28202  
Telephone: 980-373-0550  
Email: brian.heslin@duke-energy.com

2. Piedmont is a subsidiary of Duke Energy Corporation and is engaged in the business of transporting, distributing and selling natural gas in the states of South Carolina, North Carolina and Tennessee. Piedmont is a public utility under the laws of this State, and its public utility operations in South Carolina are subject to the jurisdiction of this Commission.

3. Pursuant to Rule 103-475, Piedmont engages in routine testing of its in-service meters, selected through statistical sampling, to ensure that they are achieving overall accuracy. This statistical periodic meter sampling program (“Statistical Meter Sampling Program” or “Program”) is in addition to meter testing that is required at various times by Commission Rules.

4. Piedmont’s Statistical Meter Sampling Program, as modified, was approved by the Commission on August 26, 2015 in Docket No. 2015-272-G.

5. The Program tests active meters that are serving customers which are at least ten years old and which have not otherwise been tested in the last ten years. Piedmont tests the meters by removing the active meter from the customer’s premise and performs tests on it in Piedmont’s centralized meter shop. At the same time the active meter is removed from the customer’s premise, a replacement meter is immediately installed in its place. After the replacement meter is installed, a Piedmont employee enters the customer’s home or business to relight pilots and perform safety checks to ensure that no leaks are present.

6. In light of the current pandemic related to COVID-19, Piedmont desires to suspend the Program’s testing activities for the remainder of 2020 for its “Group I” and “Group III” meters, which are the two main classes of meters used for residential and commercial premises.

7. As noted above, the meters that are tested pursuant to the Program are those that are currently active. To perform the meter tests, Piedmont must first acquire the active meters

from the field and bring them into the Company's testing facilities. This process involves a Piedmont representative going to the residential or commercial premise where the active meter is located, briefly stopping gas service to the customer in order to remove the existing meter and install a replacement meter, entering the customer's premise (home or business) in order to relight pilots and perform safety checks before leaving the customer's premise with the replacement meter in the "on" position, and then bringing the old meter to Piedmont's testing facilities.

8. In response to the COVID-19 pandemic, the Piedmont representative performing the meter swap out needs to wear personal protective equipment and take other extraordinary protective measures when inside the customer's home or business and when otherwise interfacing with the customer at their premise. Even under normal (pre-pandemic) conditions, meter testing pursuant to the Program was not typically well-received by customers because it involves work that the customer did not request, and because it requires the customer to coordinate with the Company to schedule the test and enter the customer's premise.

9. Because of the current pandemic, Piedmont does not believe that it is prudent for Piedmont representatives to enter customer premises to conduct routine meter testing pursuant to the Program, nor does the Company believe that many customers would even authorize Company personnel to enter their premises to perform this non-essential work at this time.

10. Accordingly, to ensure the health and safety of Piedmont's employees and its customers, in March 2020 Piedmont temporarily suspended the operation of the Program. In light of the continued uncertainty around when it will be safe enough to resume entering customer premises to perform this non-essential work, Piedmont now finds it reasonable and

prudent to request authorization to suspend its routine meter testing activities pursuant to the Program for the remainder of 2020.

11. The aggregate number of Group I and Group III meters in South Carolina that would have been tested per Piedmont's Program in 2020 is approximately 1,142. Piedmont began to test some of these meters in early 2020 (prior to March 2020). Given the pause in the Program since March 2020, it will not be feasible for Piedmont to complete its 2020 meter testing requirements without extraordinary action that would require deferring essential work.

12. Piedmont intends to resume the Program in 2021, assuming that COVID-19 is no longer posing a threat in the Company's service territory.

13. Piedmont has no cause for concern that suspension of the Program for the remainder of 2020 will harm customers or increase the Company's overall operational risk.

14. For all of these reasons, Piedmont respectfully requests authorization to suspend its routine meter testing activities pursuant to the Program for the remainder of 2020.

WHEREFORE, Piedmont Natural Gas Company, Inc., respectfully requests that the Commission grant authorization for Piedmont to suspend routine meter testing activities pursuant to its Statistical Meter Sampling Program for the remainder of 2020.

Respectfully submitted this 22nd day of May, 2020.

**Piedmont Natural Gas Company, Inc.**

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